

1 2 3	HEATHER E. WILLIAMS, SBN 122664 Federal Defender HOOTAN BAIGMOHAMMADI, SBN 279105 Assistant Federal Defender Designated Counsel for Service 801 I Street, Third Floor Sacramento, CA 95814		
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5	T: (916) 498-5700 F: (916) 498-5710		
6	Attorneys for Defendant Mr. Correia		
7	Wii. Concid		
8	IN THE UNITED STATES DISTRICT COURT		
9	FOR THE EASTERN DISTRICT OF CALIFORNIA		
10	UNITED STATES OF AMERICA,)	Case No. 2:23-cr-00082-JAM	
11	Plaintiff,	STIPULATION AND ORDER TO CONTINUE	
12	vs.	STATUS HEARING AND EXCLUDE TIME	
13	AARON CORREIA,	Date: August 20, 2024 Time: 9:00 a.m.	
14	Defendant.	Judge: John A. Mendez	
15	Defendant.)		
16	IT IS HEREBY STIPULATED and agreed by and between United States Attorney		
17	Phillip A. Talbert, through Assistant United States Attorney Haddy Abouzeid, counsel for		
18	Plaintiff, and Federal Defender Heather Williams, through Assistant Federal Defender Hootan		
19	Baigmohammadi, counsel for Defendant Aaron Correia, that the previously scheduled Status		
20	Hearing set for September 17, 2024 be continued to September 24, 2024 at 9:00 a.m.		
21	The parties specifically stipulate as follows:		
22	1. By previous order, the St	eatus Hearing is currently scheduled for September 17,	
23	2024 at 9:00 a.m. Time l	has been ordered excluded through that date.	
24	2. Mr. Correia respectfully	requests that the Court continue the Status Hearing to	
25	September 24, 2024, at 9:00 a.m.		
26	3. The government has prod	duced 101 pages and various audio recordings in	
27	discovery. Mr. Correia re	equires additional time to review the discovery;	
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investigate and research possible defenses; research potential pretrial motions; 1 explore potential resolutions to the case; and otherwise prepare for trial. 2 3 4. Mr. Correia believes that failure to grant his motion would deny him the 4 reasonable time necessary for effective preparation, taking into account the 5 exercise of due diligence. 6 5. The government does not object to Mr. Correia's motion. 7 6. For the purpose of computing time under 18 U.S.C. § 3161 et seq. (Speedy Trial 8 Act), the parties request that the time period between September 17, 2024 and 9 September 24, 2024, inclusive, be deemed excludable pursuant to 18 U.S.C. § 10 3161(h)(7)(B)(iv) (Local Code T4), because it would result from a continuance 11 granted by the Court at the defense's request, based on a finding that the ends of 12 justice served by granting the continuance outweighs the best interest of the 13 public and Mr. Correia in a speedy trial. 14 15 Respectfully submitted, 16 HEATHER E. WILLIAMS Federal Defender 17 Date: September 9, 2024 /s/ Hootan Baigmohammadi 18 HOOTAN BAIGMOHAMMADI Assistant Federal Defender 19 Attorneys for Defendant Mr. Correia 20 21 Date: September 9, 2024 PHILLIP A. TALBERT 22 United States Attorney 23 /s/ Haddy Abouzeid 24 **HADDY ABOUZEID** Assistant United States Attorney 25 Attorneys for Plaintiff 26 27

Case 2:23-cr-00082-JAM Document 33 Filed 09/13/24 Page 2 of 3

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The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, ADOPTS the parties' stipulation in its entirety as its order. IT IS SO ORDERED. Dated: September 13, 2024 //s/ John A. Mendez THE HONORABLE JOHN A. MENDEZ SENIOR UNITED STATES DISTRICT JUL. SENIOR UNITED STATES DISTRICT JUL. 11		Case 2:23-cr-00082-JAM Docum	nent 33 Filed 09/13/24 Page 3 of 3	
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